

Ronald J. Wronko • O

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MEMO ENDORSED

The Court will conference
this matter on September 13, 2013
at 12:15 p.m. Counsel is to
make sure Dr. Varughese is
present at the conference

Allen McMahon

August 22, 2013

VIA FACSIMILE

Hon. Colleen McMahon, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: Leena Varughese, M.D. v. Mount Sinai Medical Center, et al.
Civil Action No. 12 Civ. 8812 (CM)

Dear Judge McMahon:

I represent Leena Varughese, M.D., in the above-referenced matter. I write to request permission to file application under seal to be relieved as counsel in the above-referenced matter. Without divulging any privileged communications, there has been a break-down in the attorney-client relationship. Accordingly, I believe it necessary to file this application.

While my application will be pending, I will continue to move this matter forward through fact discovery. However, it is anticipated that regardless of the outcome of my motion to be relieved, the fact discovery deadline will need to be extended to complete defense depositions in this matter. If my application is granted, plaintiff will also likely require additional time to find substitute counsel and for such counsel to move forward with the case. While discovery deadlines in the schedule were postponed on account of mediation in this matter, there has been no corresponding extension of the fact discovery cut-off. Accordingly, as part of my application, I intend to also request an extension of the fact discovery cut-off if I cannot extend such dates on consent upon conference with Mr. McEvoy.

Hon. Colleen McMahon, U.S.D.J.
August 22, 2013

I thank the Court for its consideration of this request.

Respectfully submitted,

Ronald J. Wronko

cc: Leena Varughese, M.D.
Rory McEvoy, Esq.

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FAX COVER SHEET

DATE: AUGUST 22, 2013

To: Hon. Colleen McMahon, U.S.D.J. (212) 805-6326
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SENDER: RONALD J. WRONKO, ESQ.

NO. OF PAGES (INC. COVER): 3

COMMENTS:

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